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***Attorneys for Plaintiffs*** UMG Recordings, Inc.; Capitol Records, LLC; Concord Bicycle Assets, LLC; CMGI Recorded Music Assets LLC; Sony Music Entertainment; and Arista Music

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

UMG RECORDINGS, INC., CAPITOL  
RECORDS, LLC, CONCORD BICYCLE  
ASSETS, LLC, CMGI RECORDED MUSIC  
ASSETS LLC, SONY MUSIC  
ENTERTAINMENT, and ARISTA MUSIC  
Plaintiffs,  
vs.  
INTERNET ARCHIVE, BREWSTER  
KAHLE, KAHLE/AUSTIN FOUNDATION,  
GEORGE BLOOD, and GEORGE BLOOD,  
L.P.  
Defendants.  
Case No.: 3:23-cv-06522-MMC  
**Plaintiffs' Notice of Motion to Compel  
Discovery**  
**Date:** December 12, 2024  
**Time:** 9:30 a.m.  
**Courtroom:** B  
**Judge:** Mag. Judge Laurel Beeler

## **NOTICE OF MOTION**

**TO THE COURT, ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

3 PLEASE TAKE NOTICE THAT ON Thursday, December 12, 2024 at 9:30 a.m., or as  
4 soon thereafter as counsel may be heard, in Courtroom B, located in the Philip Burton Federal  
5 Building and United States Courthouse, 450 Golden Gate Avenue, San Francisco, California  
6 94102, pursuant to Rule 37(a) of the Federal Rules of Civil Procedure and N.D. Cal. Local Rule  
7 37-2, Plaintiffs UMG Recordings, Inc., Capitol Records, LLC, Concord Bicycle Assets, LLC,  
8 CMGI Recorded Music Assets LLC, Sony Music Entertainment, and Arista Music (“collectively,  
9 “Plaintiffs”) move the Court to compel Defendants Internet Archive (“IA”), Brewster Kahle  
10 (“Kahle”), George Blood (“Blood”), and George Blood L.P. (“GBLP”) to produce several  
11 important categories of documents and information in response to Plaintiffs’ First Set of Requests  
12 for Production (“RFP”) to Defendants and Plaintiffs’ First Set of Interrogatories to Internet  
13 Archive (“ROGs”), as detailed in Plaintiffs’ Motion to Compel Discovery and accompanying  
14 declaration. ECF Nos. 127-128.

Dated: November 12, 2024

Respectfully submitted,

/s/ *Danae Tinelli*

Matthew J. Oppenheim

Corey Miller

Danae Tinelli

Noel M. Cook

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